

Date: October 2022

## **COMPANY POLICIES & LEGISLATION**

This file is designed to provide our customers with a single document covering compliance with all current national and international legislation as well as all company policies covering the products supplied by P.A.R. (Insulations & Wires) Limited and our group company Electric Motor Components (E.M.C.).

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### **QUALITY POLICY STATEMENT – BS EN ISO 9001:2015**

P.A.R. (Insulations & Wires) Limited and Electric Motor Components are committed to the supply of quality products, right for purpose and maintain full traceability on all products at the customer's request.

As distributors, we are careful in the selection of our manufactured sources and all sources have a formally approved quality system.

We will comply with all relevant requirements as identified by the company.

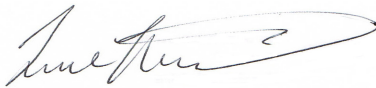
All products are stored strictly in accordance with manufacturers recommendations; particularly those with a limited shelf-life.

The Company has established objectives relevant to customer satisfaction and product conformity. These are reviewed and documented at period Management review meetings.

It is essential that all staff members are aware of the Companies commitment to Quality Assurance, for which a Quality Manual has been prepared along with all associated procedures in accordance with BS EN ISO 9001:2015.

The Quality manual will be issued to certain persons in the management and inspection of quality on a day-to-day basis and relevant quality procedures will also be made available to individuals to enable them to take appropriate action to operate the Quality System, which is mandatory to all personnel.

By reviewing and developing the Companies procedures, aim for continual improvement of the Quality System.



P M Hirst  
Managing Director

## **GENERAL HEALTH & SAFETY POLICY**

### **Policy Statement**

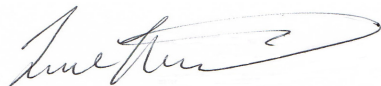
It is the Directors intent to pursue a policy to promote Health & Safety at work and to seek the co-operation of all employees to achieve this, P.A.R. (Insulations & Wires) Limited will provide working conditions, which comply with:

- (a) The relevant Statutory requirements and
- (b) Officially approved codes of practise that are designed to ensure good standards of Health & Safety.

### **Particular regard will be paid to:**

- 1.1 Providing information, instruction, and supervision to enable all employees to contribute positively to their own health and safety at work.
- 1.2 Electrical equipment and systems of work to ensure they are safe and do not endanger health.
- 1.3 Providing safe arrangements for the storage, handling and movement of materials and substances, in particular solvents.
- 1.4 Providing welfare facilities and benefits as far as is reasonably practicable.
- 1.5 Providing safe means of access to and exit from places of work, which are under the company's control.
- 1.6 Providing ear protection in the braiding area and ensuring by the Company's Disciplinary Procedures that failure to comply could lead to dismissal.
- 1.7 The implementation and work to COSHH.
- 1.8 Keeping clean and tidy working areas.
- 1.9 Ensuring that smoking is not allowed on company premises.
- 1.10 Providing training of Health & Safety Procedures during the induction procedures and afterwards in accordance with the Operational Procedures.

Although the company operates in an industry that is of low risk, injuries and illnesses can happen in any environment and it is the Board of Directors' objective to reduce the incidence of these to an absolute minimum, not merely in keeping with, but surpassing, the best experience in other similar organisations.



P M Hirst  
Managing Director

## **ENVIRONMENTAL POLICY**

P.A.R. (Insulations & Wires) Limited is a responsible member of the community and operates a strict and vigorous environmental policy.

### **The policy is designed to:**

1. Eliminate damage to ecology and prevent pollution of the environment.
2. Maintain and improve the appearance of the Company's premises.
3. Promote good relations and communications between the Company, local residents & Authorities.
4. Promote the efficient use of energy.

These aims are reflected in the attention given to Quality & Safety on site and the Company priority for good environmental practice fostered within its employees.

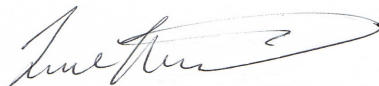
The Company makes every reasonable effort to minimise volatile emissions to atmosphere. In addition, every effort is made to avoid pollution of the atmosphere, the soil and watercourses in and around its site. Where possible waste products are re-cycled, but if this is not possible, they are disposed of in an appropriate, approved manner. Waste is never dumped on site.

Watercourses are protected to prevent pollution through accidental escape of chemicals and are monitored.

Noise is carefully monitored in order to comply with any legal requirements. Plant machinery and vehicles are purchased with due consideration of noise requirements and every effort is made to reduce existing noise levels still further through plant modifications.

Contractors working on site are carefully controlled to ensure they maintain the same high environmental standards set by the Company.

The visual appearance of the Company's buildings, offices and grounds is upheld by regular maintenance and painting.



P M Hirst  
Managing Director

Date: July 2020

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## **EQUALITY & DIVERSITY POLICY**

### **Policy Commitment**

P.A.R. (Insulations & Wires) Limited seeks to promote equality of opportunity for all. We also recognise and celebrate diversity.

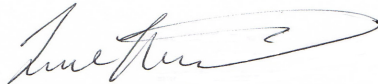
The Company is committed to the provision of an environment that is free from discrimination in any form, for it's employees and any other persons who have contact with the organisation.

The Company deplores all forms of harassment and seeks not only to provide a harassment free environment, but to also take determined action under its disciplinary procedures to remove any direct or indirect discrimination, which may occur.

The Company is determined to monitor existing practice and where required developed new procedures in order to prevent employees and persons who would seek employment with the Company from suffering any experience which contravenes this policy.

### **The Law**

P.A.R. (Insulations & Wires) Limited accepts its obligations in spirit and intention of the various statutory instrument, Acts of Parliament, and codes of practice, which promote the ethos of equality.



P M Hirst  
Managing Director

## **MODERN SLAVERY POLICY**

This statement sets out the steps taken by P.A.R. (Insulations & Wires) Limited and Electric Motor Components to ensure that our business and supply chain are free from slavery and human trafficking.

### **Summary**

We are committed to ensuring that we supply high quality products that are sourced and manufactured in a fair, ethical, and environmentally responsible way. We have a zero-tolerance approach to modern slavery of any kind within our operations and supply chain. Our workers are encouraged to report any concerns they may have, and management are required to act upon them.

We have taken steps to ensure that slavery and human trafficking do not take place in any part of our business or supply chain. We are proud of the steps we have taken to date which include:

- implementing a formal supplier approval process across our supply base.
- ensuring all staff are paid at least a living wage.

### **Our business**

We are a specialist distributor of electrical insulation products supplying manufacturers and repairers of electrical machines such as generators, electric motors & transformers. Our products include a wide range of technically advanced electrical insulation materials, which are stocked and distributed from our head office in Chesterfield, England.

### **Our supply chain**

Our supply chain is global and includes material suppliers across the UK, Europe, Asia and the US. We buy from these suppliers on a direct basis. In addition, we have several indirect material and service providers.

### **Our policies on slavery and human trafficking**

Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015. As part of this process, we have undertaken a review of our supply chain to identify and assess potential risk areas.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

### **Responsibility for the Policy**

The management of the business has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all our people comply with it.

### **Compliance with the Policy**

You must ensure that you read, understand, and comply with this policy.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Although you should report any concerns regarding modern slavery and/or human trafficking in any parts of our business or supply chains in accordance with our whistleblowing policy, you are also encouraged to discuss a specific matter (or our policy or relevant legislation) with any member of the legal department.

If you are in any doubt about whether a particular act or working conditions in any of our business relationships may contravene any aspect of this policy, then err on the side of caution and report it in accordance with the whistleblowing policy.

We encourage openness and will support anyone who raises genuine concerns in good faith in accordance with the firm's whistleblowing policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their knowledge, or suspicion, that modern slavery is taking place in any part of our business or in any of our supply chains.

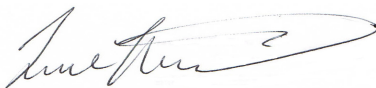
### **Communication and Awareness of this Policy**

Our zero-tolerance approach to modern slavery is communicated to all significant suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Breaches of this Policy**

Any employee who breaches this policy could face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



P M Hirst  
Managing Director

Date: July 2020

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### **COUNTERFEIT GOODS POLICY**

P.A.R. (Insulations & Wires) Limited and Electric Motor Components understand that counterfeiting is a serious issue and poses a significant safety hazard to industry. P.A.R. and E.M.C. do not use, nor condone the use of counterfeit and grey market products. P.A.R. and E.M.C. also expect our supply chain to adhere to our ethical business standards and mirror our practices and procedures.

P.A.R. and E.M.C. are committed to supplying only the highest quality original parts to our customers. P.A.R. and E.M.C. purchase components only through Authorised Manufacturers and Suppliers, thereby ensuring their product is new, authentic, and fully warrantable directly by the supplier. Authorised Manufacturers and Suppliers are continually assessed through a Supplier Audit program and purchase from outside the authorised supplier chain is prohibited.

P.A.R. and E.M.C. will inspect all parts upon receipt and ensure that all parts comply with manufacturers specifications and that up-to-date technical information is readily available. Any part that is deemed to be counterfeit will be quarantined and documented and an investigation will be carried out in conjunction with the supplier. Depending on the outcome of the investigation, the supplier may either be removed from our Approved Supplier List should they be found to have been in any way culpable in supplying counterfeited goods or conditionally reinstated as an approved supplier to P.A.R. and E.M.C. if they are found to have had no involvement in the supply of counterfeited goods.

P.A.R. and E.M.C. maintain full traceability for all purchases, as well as any non-conforming items returned for investigation by our customers. All returned items are sent directly to the manufacturer for further investigation, at which stage any counterfeit goods will readily identified, thereby adding a further level of scrutiny to our counterfeit goods process.



P M Hirst  
Managing Director



## **ANTI-BRIBARY & CORRUPTION POLICY**

### **Purpose**

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

### **Policy Statement**

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory or personal advantage. It is our policy to conduct all our business in an honest and ethical manner. We take a zero- tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad. Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

### **Scope**

Who is covered by the policy? In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy). This policy covers:

Bribes, Gifts and hospitality, Facilitation payments, Political contributions, Charitable contributions.

### **Bribes**

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor).

### **Gifts and Hospitality**

Employees must not offer or give any gift or hospitality which could be regarded as illegal or improper, or which violates the recipient's policies. Unless approved in writing by the Managing Director employees may not accept any gift or hospitality from our business partners if it is in cash, if there is any suggestion that a return favour will be expected or implied unless approved in writing by the Managing Director. If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the Managing Director and donated to charity.

### **Political Contributions**

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

### **Charitable contributions**

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the managing director. All charitable contributions should be publicly disclosed.

### **Your Responsibilities**

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify the managing director as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

### **Record-Keeping**

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review. You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

### **How to Raise a Concern**

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with the Managing Director.

### **What to do if you are a victim of Bribery or Corruption**

It is important that you tell the managing director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

### **Protection**

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the managing director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.

### **Training and Communication**

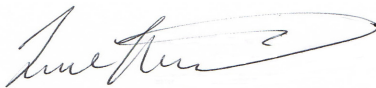
Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.

### **Who is responsible for the policy?**

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The operations manager has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them is made aware of and understand this policy and are given adequate and regular training on it.

### **Monitoring and Review**

The Managing Director will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. Employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it may be improved. This policy does not form part of any employee's contract of employment, and it may be amended at any time.



P M Hirst  
Managing Director

Date: September 2015  
Updated: October 2022

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## **LEGISLATION**

This document covers the following legislation:

1. Restriction of Hazardous Substances (RoHS)
2. Registration, Evaluation, Authorisation & restriction of Chemicals (REACH)
3. Dodd Frank Wall Street Reform & Consumer Protection Act 2010: Section 1502 – Conflict Minerals

### **1. RoHS**

The Restriction of the use of certain Hazardous Substances (RoHS) in Electrical and Electronic Equipment (EEE) is European Union regulation which aims to prevent hazardous substances from entering the production process and thereby keep them out of the waste stream.

The original Directive 2002/95/EC (RoHS 1) has been superseded by Directive 2011/65/EU (RoHS 2) and again with Directive 2015/863/EU (RoHS 3).

To the best of our knowledge and based on the information provided by our supply chain, all our products comply with the above-mentioned directives and are free from the substances specified.

### **2. REACH**

REACH is a European Union regulation concerning the Registration, Evaluation, Authorisation, and restriction of Chemicals. It came into force on 1st June 2007 and replaced several European directives and regulations with a single system.

Since REACH came into force, a candidate list of 'Substances of Very High Concern' (SVHC) has been issued by the European Chemicals Agency (ECHA) which is being constantly updated with new substances.

To the best of our knowledge and based on the information provided by our supply chain, all our products comply with the above-mentioned directive and are free from the substances on the SVHC list.

### **3. CONFLICT MINERALS**

'Conflict Minerals' are a group of minerals consisting of tantalum, tin, tungsten and gold ('3TG') which are mined in the Democratic Republic of Congo (DRC) or surrounding areas.

It has been reported that the sales and profits of such minerals in this region have helped fuel war and human rights violations.

As such, the US Securities & Exchange Commission (SEC) have adopted rules that any publically traded company must submit an annual report disclosing if they use any conflict minerals and their country of origin. (Dodd Frank Act).

To the best of our knowledge and based on the information provided by our supply chain, all our products comply with the above-mentioned directive and are not sourced from the DRC.



P M Hirst  
Managing Director